

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

ZACKARY ELLIS SANDERS,

Defendant.

Criminal No. 1:20-CR-143

Trial Date: October 19, 2021

Hon. T. S. Ellis III

GOVERNMENT'S PROPOSED VERDICT FORM

The government respectfully requests that the Court use the attached verdict form at trial  
in the above captioned matter.

Respectfully submitted,

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United States Attorney

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VERDICT FORM

COUNT ONE

With respect to Count One, production of child pornography:

We, the jury, find the Defendant, ZACKARY ELLIS SANDERS:

Not Guilty: \_\_\_\_\_

Guilty: \_\_\_\_\_

COUNT TWO

With respect to Count Two, production of child pornography:

We, the jury, find the Defendant, ZACKARY ELLIS SANDERS:

Not Guilty: \_\_\_\_\_

Guilty: \_\_\_\_\_

COUNT THREE

With respect to Count Three, production of child pornography:

We, the jury, find the Defendant, ZACKARY ELLIS SANDERS:

Not Guilty: \_\_\_\_\_

Guilty: \_\_\_\_\_

COUNT FOUR

With respect to Count Four, production of child pornography:

We, the jury, find the Defendant, ZACKARY ELLIS SANDERS:

Not Guilty: \_\_\_\_\_

Guilty: \_\_\_\_\_

COUNT FIVE

With respect to Count Five, production of child pornography:

We, the jury, find the Defendant, ZACKARY ELLIS SANDERS:

Not Guilty: \_\_\_\_\_

Guilty: \_\_\_\_\_

COUNT SIX

With respect to Count Six, receipt of child pornography:

We, the jury, find the Defendant, ZACKARY ELLIS SANDERS:

Not Guilty: \_\_\_\_\_

Guilty: \_\_\_\_\_

COUNT SEVEN

With respect to Count Seven, receipt of child pornography:

We, the jury, find the Defendant, ZACKARY ELLIS SANDERS:

Not Guilty: \_\_\_\_\_

Guilty: \_\_\_\_\_

COUNT EIGHT

With respect to Count Eight, receipt of child pornography:

We, the jury, find the Defendant, ZACKARY ELLIS SANDERS:

Not Guilty: \_\_\_\_\_

Guilty: \_\_\_\_\_

COUNT NINE

With respect to Count Nine, receipt of child pornography:

We, the jury, find the Defendant, ZACKARY ELLIS SANDERS:

Not Guilty: \_\_\_\_\_

Guilty: \_\_\_\_\_

COUNT TEN

With respect to Count Ten, receipt of child pornography:

We, the jury, find the Defendant, ZACKARY ELLIS SANDERS:

Not Guilty: \_\_\_\_\_

Guilty: \_\_\_\_\_

COUNT ELEVEN

With respect to Count Eleven, receipt of child pornography:

We, the jury, find the Defendant, ZACKARY ELLIS SANDERS:

Not Guilty: \_\_\_\_\_

Guilty: \_\_\_\_\_

COUNT TWELVE

With respect to Count Twelve, possession of child pornography:

We, the jury, find the Defendant, ZACKARY ELLIS SANDERS:

Not Guilty: \_\_\_\_\_

Guilty: \_\_\_\_\_

*If your verdict is not guilty as to Count Twelve, please do not answer the following question.  
If your verdict is guilty as to Count Twelve, please answer the following question:*

Did a visual depiction involved in the offense charged in Count Twelve involve a  
prepubescent minor or a minor who had not attained 12 years of age?

No: \_\_\_\_\_

Yes: \_\_\_\_\_

So say we all this \_\_\_\_ day of \_\_\_\_\_, 2021.

\_\_\_\_\_  
Foreperson

## CERTIFICATE OF SERVICE

I hereby certify that on October 25, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which automatically generated a Notice of Electronic Filing to the parties of record.

By: /s/  
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